

**BELLSOUTH**

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December 18, 1997

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Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, Room 222  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: CC Docket No. 97-208, BellSouth Application for Provision of In-Region  
InterLATA Services in South Carolina and CC Docket No. 97-231, BellSouth  
Application for Provision of In-Region InterLATA Services in Louisiana

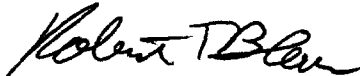
Dear Ms. Salas:

Yesterday in the late afternoon, Duane Ackerman, David Markey, Kathleen Levitz and the undersigned met with Chairman William Kennard, the Chairman's Chief of Staff, John Nakahata, the Chairman's common carrier legal advisor, Thomas Power, the General Counsel, Christopher Wright, and the Chief of the Common Carrier Bureau, A. Richard Metzger, Jr. During the meeting Mr. Ackerman urged the approval of BellSouth's pending application for authority to enter the in-region, interLATA market in South Carolina. The attached document formed the basis for our discussion of that application.

Two copies of this notice are filed in accordance with Section 1.1206(a) of the Commission's rules.

Please call me if you have any questions on this matter.

Sincerely yours,



Robert Blau  
Vice President - Executive and Federal Regulatory Affairs

Attachment:

Cc: William Kennard  
John Nakahata  
Thomas Power

Christopher Wright  
A. Richard Metzger Jr.

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## BellSouth's Commitment to Opening the Local Market

Since the enactment of the Telecommunications Act of 1996, BellSouth steps to promote local competition include:

- The establishment of a **single** point of contact for all negotiations between BellSouth and local competitors. To date, BellSouth has signed over **250 interconnection agreements** with local competitors in our markets. This is by far the highest number of agreements signed by any regional Bell company. There are over **400 CLECs** certified to provide service in the BellSouth region.
- The creation of the Network and Carrier Services organization (7/97) dedicated to providing network services to both CLEC customers in the BellSouth region, and to BellSouth's own marketing units. This organization includes dedicated account teams and service centers, including the **Local Carrier Service Center (LCSC)** and the **Unbundled Network Element Center (UNEC)**, for CLEC customers.
  - The LCSC provides **24 hour, 7 day-a-week access** for CLEC customers for service delivered on par to that provided to our traditional residential and business customers.
  - The LCSC and associated operational support systems have processed orders for over **170,000 resale lines and unbundled loops** from our CLEC customers.
  - The LCSC is currently providing service to almost **70** of these customers (CLECs) across our region.
- The development and implementation of **electronic interfaces and operational support systems (OSS)** for pre-ordering, ordering, provisioning, maintenance and repair, and billing functions by CLEC customers in ordering services from BellSouth.
  - By year-end, BellSouth will have committed almost **\$500 million** for assuring our systems and processes are designed to allow competitors access to our local phone service markets. Employee resources dedicated to CLEC customers will total over **700**.
  - BellSouth has trained over **600** representatives from various CLECs in order to make sure they can use our systems to process orders for their own customers.
  - BellSouth systems have a capacity to process **10,000** orders a day from competitors using our electronic interfaces.
  - We are currently processing over **1,400 service orders per day** for our CLEC customers. (NOTE: includes manual and electronic)
- The Louisiana and South Carolina Public Service Commissions have **ruled** that BellSouth meets the 14-point checklist defined in the Telecommunications Act. These orders have found that BellSouth has the appropriate systems in place to accommodate local competitors in our markets.

Business needs have continued to drive improvements in our OSS and performance measurement systems. By the end of March, we will be in compliance with all published standards and major known OSS concerns raised by the DOJ and the CLECs - even though we view them as microregulation and beyond the

requirements of the Act. (One example is electronic notification of orders rejected because of incomplete or incorrect information. BLS took the initiative and negotiated this with the CLECs even though no national standards yet exist.)

<u>Specific items</u>	<u>Date</u>
Remove 100 telephone Number reservation limit	Jan. 1998
ECTA (Electronic Communications Trouble Administration) (BLS completed in Nov, and AT&T requested delay until February. This is a machine-to-machine interface!)	Feb., 1998
Electronic reject notification (above)	March, 1998
Compliance with Version 7.0 national standards of the TCIF (Telecommunications Industry Forum) which is part of the OBF (Ordering and Billing Forum)	March, 1998
<ul style="list-style-type: none"> <li>• BellSouth is also developing <b>specialized</b> electronic interfaces to meet the individual needs of local competitors. An example is the development of a system called EC Lite for AT&amp;T on schedule for delivery by year-end. One of the functions this new system will provide is machine-to-machine pre-ordering information for both UNEs and resale. The company is also developing a special maintenance and repair system for both AT&amp;T and MCI</li> </ul>	

Other Details:

- \* BellSouth currently offers automatic/electronic ordering for 30 simple resale products and 4 unbundled network element (UNEs) through these systems. We also offer 20 other complex resale and UNEs services for competitors. The products offered to our competitors generate **over 90%** of BellSouth's total retail consumer and small business revenue, and **over 80%** of BellSouth's large business revenues.
- \* BellSouth has established **not one but two electronic interface options** for use by competitors for ordering functions.
- \* BellSouth developed the Electronic Data Interchange (EDI) interface in accordance with **national standards** and it provides CLEC customers with the ability to electronically enter customer service orders to BellSouth for provisioning through to the network. EDI supports all order types in the Ordering and Billing Forum national standard.
- \* BellSouth has also developed the **LENS (Local Exchange Navigation System)** for use by competitors. This interface provides access to BellSouth systems for securing and confirming pre-ordering information (such as telephone numbers, addresses, feature availability, customer service records, and due dates), and for executing real-time ordering functions for CLEC customers.
- \* For maintenance and repair functions, BellSouth has made the **Trouble Analysis Facilitation Interface (TAFI)** available for use by competitors. This is the same system the BellSouth uses to identify, analyze, and perform maintenance and repair activity for its own customers..
- \* BellSouth's performance in connecting competitors to our network is equal to or better than the level of service provided to our own residential and business customers. BellSouth has met the CLEC committed due dates for installing service at a rate of **over 98%** for CLEC residence orders, and **over 99%** for business customers.